

14.1.1.1-1110

PINTLAR CORPORATION

1005 W. McKinley (208) 784-1321
P.O. Box 480 Fax (208) 783-6621
Kellogg, Idaho 83837

RECEIVED
JUN 20 1994

SUPERFUND REMEDIAL BRANCH

June 13, 1994

Ms. Becky Goehring
U.S. EPA
422 W. Washington Street
Boise, ID 83702

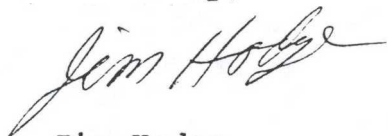
Dear Ms. Goehring:

Enclosed please find a copy of the Asbestos Removal Work Plan for the work to be performed at the Coke & Coal Bins at the Lead Smelter Complex. The Notification for this project was sent to you on June 3, 1994.

We would like to notify you of a change in the start date for this project. We anticipate that work will begin on June 22, 1994 instead of June 16, 1994 as was originally planned.

If you have any questions on this information please call me at 784-1321.

Sincerely,



Jim Hodge
Environmental Manager

cc: Jack Matranga
Bill Hudson
Scott Peterson
Nick Ceto

14. 1. 1. 1 1110 64394

ASBESTOS REMOVAL WORK PLAN

COKE & COAL BINS

BUNKER HILL SUPERFUND SITE

Prepared By:

PINTLAR CORPORATION

TABLE OF CONTENTS

1.0	INTRODUCTION.....	1
2.0	ASBESTOS REMOVAL PROCEDURES.....	1
	2.1 TRANSITE REMOVAL PROCESS.....	1
	2.2 PIPE WRAP REMOVAL.....	2
3.0	NOTIFICATION OF ACTIVITIES.....	2
4.0	PERSONAL PROTECTION.....	2
	4.1 RESPIRATORY PROTECTION.....	3
5.0	MONITORING.....	3

1.0 INTRODUCTION

The purpose of this work plan is to outline the methods of handling and disposal of Asbestos Containing Materials (ACM) during remedial activities to be conducted on the Coke & Coal Bins within the Smelter Complex of the Bunker Hill Superfund Site. The methodologies and remedial actions developed in conjunction with this work plan will provide prudent environmental protections and maintain the health and general welfare of site workers.

The Coke & Coal Bins pipe wrap removal project is being conducted in conjunction with the preparation of the bins for timber salvage project for the Smelter Complex.

2.0 ASBESTOS REMOVAL PROCEDURES

This section will cover the set-up and work practices for the removal of ACM for the Coke & Coal Bins. Notification of ACM abatement activity will be made to EPA consistent with Section 3.0 of this plan prior to beginning the removal action. Asbestos exposure monitoring will be conducted on the asbestos abatement operations to determine the level of airborne asbestos during the asbestos removal project.

The first step in the remediation project will be to clean up any ACM on the ground outside the bins. Any visible ACM on the ground will be collected and placed in a plastic asbestos disposal bag, double bagged and moved to the repository location. The Coke & Coal Bins abatement removal actions will include Category II nonfriable ACM (roofing), and also friable pipe wrap material that must be removed prior to preparing the structure for timber removal. All abatement operations will be conducted in such a manner as to allow no visible emissions during the project.

2.1 ROOFING REMOVAL PROCESS

Roofing material will be removed using the following method. First, the roof to be remediated will be wet down with water to prevent the release of air borne emissions during abatement activities. The roof will be wet down on a regular basis, approximately once per hour, throughout the work day. The sheets of roofing will be removed by use of a pry bar or shovel to carefully remove the roofing. This will be done by working the pry bar under the lower edge and prying upward to loosen the nail heads or pull them through the roofing piece. Roofing breakage will be held to minimum by using this method. The roofing will be placed in plastic lined

fiberglass cell boxes and then moved to the repository. The plastic liner will be tied off and lifted from the cell box and placed in the laydown area so the cell box can be reused for additional siding.

2.2 PIPE WRAP REMOVAL

The ACM that is attached to the pipe will be removed using standard glovebag methods. The pipe wrapping will be wet down with amended water before the glovebag is attached. After the pipe wrap has been removed and placed in the glovebag the glovebag will be placed in a asbestos disposal bag and then transported to the lay down area.

3.0 NOTIFICATION OF ACTIVITIES

The presence of threshold quantities of Regulated Asbestos Containing Material (RACM) triggers National Emission Standards for hazardous Air Pollutants (NESHAP) notification and ACM emission controls.

Notification of ACM removal activities will be provided to EPA and the IDHW on scene coordinator prior to project initiation.

The notification form will be filed 10 working days prior to the start of abatement operations.

The notice to perform ACM abatement operations will be filed on the NOTIFICATION OF DEMOLITION AND RENOVATIONS form (see Attachment A) and submitted to:

Ms Becky Goehring
U.S. EPA
422 W. Washington St.
Boise, Idaho 83702

4.0 PERSONAL PROTECTION

The level of protection to be worn by field personnel will be defined and controlled by the Site Manager, Health and Safety Manager and Health and Safety Officer. Protection may be upgraded as site conditions require. The decision to change the level of protection will be based on the analysis of monitoring data and the Permissible Exposure Levels (PEL's). Based on the results of the personal air monitoring data, project tasks may be upgraded as necessary throughout the course of the project. Level C with full face respiratory protection will be implemented at the start-up of the project.

4.1 RESPIRATORY PROTECTION

Respiratory protection will be employed at all times during the asbestos abatement project utilizing full face respirators. Workers may be up graded to higher levels of respiratory protection should air monitoring analytical data indicate the need.

Level C - Full-Face air purifying respirator with high efficiency particulate (HEPA) filter.

5.0 MONITORING

Airborne emissions of asbestos or particulates are not anticipated during the Coke & Coal Bins asbestos abatement project. Surveillance is for the purpose of verifying that site workers are not exposed to particulate contaminants in concentrations of concern. Surveillance will include personnel monitoring.

Personal air samples will be collected on workers conducting the ACM removal to ensure that workers are not exposed to air borne fibers above the acceptable levels. Samples will be collected daily on at least one member of each work crew and analyzed for total asbestos fiber content.

Samples will be collected using personal air pumps affixed at the waists of the workers with tubing attached to collection filters in the breathing zone. Sampling time will be for the duration of a work shift, typically eight hours.

An air flow of 1000 to 2500 ml/min for asbestos analysis. The personal air pumps will be calibrated, used and maintained in accordance with the manufacturer's specifications. The personal air monitors will be calibrated before and after each use and the results will be recorded.

Additional testing or analysis may be required dependent upon the criteria involved.